

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

CASE NO. 1:11-CV-1902-CCC-MEM

WALLACE DEEN-MITCHELL, SR.
2400 ROBERT F. MILLER DR.
LEWISBURG, PA 17837. 1000

PLAINTIFF,

V.

HARLEY G. LAPPIN
3102 ERWIN COURT
ANNAPOLIS, MARYLAND
21403

DIRECTOR, BUREAU OF PRISONS

AND

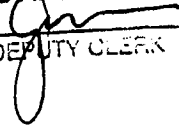
THOMAS R. KANE, DIRECTOR
FEDERAL BUREAU OF PRISONS
320 FIRST ST., N.W.
WASHINGTON, DC 20534

AND

HARRELL M. WATTS, ADMINISTRATOR
FEDERAL BUREAU OF PRISONS
320 FIRST ST., N.W.
WASHINGTON, DC 20534

FILED
SCRANTON

MAY - 4 2012

MARY E. D'ANDREA, CLERK
Per  DEPUTY CLERK

A CIVIL COMPLAINT (28 USC 1331) (42 U.S.C. 1985)
AMENDED

AND

JONATHAN B. MAY,
 SPECIAL AGENT
 U.S. DEPARTMENT OF JUSTICE
 1 BATTERY PARK PLAZA, 24TH FLOOR
 NEW YORK, NY 10004

AND

BRIAN A. BLEDSOE, WARDEN,
 KRISTA REAR, ASSOCIATE WARDEN,
 DAVID C. YOUNG, ASSOCIATE WARDEN,
 DAVID HUDSON, ASSOCIATE WARDEN,
 JOHN ADAMI, UNIT MANAGER,
 DEAN HOLLENBACH, UNIT MANAGER,
 BRADLEY TRATE, CAPTAIN,
 SEAN SNIDER, DEPUTY CAPTAIN,
 MICHAEL S. ROMANO, ADVISOR,
 LORI L. CUNNINGHAM, LEAD ADVISOR,
 FRANK PERREW, INVESTIGATOR GUARD
 PRISON GUARD, J. FOSNOT,
 DAVID OLENSHESKI, MAIL GUARD,
 B. CHAMBERS, DHO,
 A. JORDAN, ASSISTANT DHO,
 DR. MINK, PSYCHOLOGIST,
 DR. CANNON, PSYCHOLOGIST,
 LAWRENCE KARPEN, PSYCHOLOGIST,
 KEVIN BITTENBENDER, DHO,

KEVIN PIGOS, M.D.,
 KENNETH ZOOK, PA-C
 MARK PREORIA, PA-C
 FRANCIS FASCIANA, PA
 L. POTTER, EMT,
 DR. CONTRI, psychologist,
 LT. Jim HEPNER,
 LT. PEDRO CARRASQUILLO,
 LT. Jim FLEMING,
 LT. L. HUNTER,
 LT. J. MATTINGLY,
 LT. R. JOHNSON,
 LT. J. SEERBA,
 LT. R. SCAMPONE
 PRISON GUARD SUZANNE HEATH
 LT. A. SASSAMAN
 N. NEVELS

PRISON GUARD S. PRUTZMAN,
 PRISON GUARD J. WAGNER,
 PRISON GUARD K.A. METZGER,
 PRISON GUARD ED C. BIDDLE,
 PRISON GUARD L. CRAWFORD,
 PRISON GUARD C. POETH,
 PRISON GUARD M. HUMMEL,
 PRISON GUARD JEFFREY SCHMIDT,
 PRISON GUARD J. MALAKOSKI,
 PRISON GUARD T. WITONER, S.I.S.,

PRISON GUARD J. VARGESON,
PRISON K. GEMBERLING,
PRISON GUARD L. LYONS, T.F.S.,
PRISON GUARD MATTHEW EDINGER,
PRISON GUARD D. ARCHER,
PRISON GUARD DAVID REED,
PRISON GUARD R. SEAGRAVES,
PRISON GUARD MICHAEL HORNBERGER,
PRISON GUARD PFLUGER, I.S.O.,
PRISON GUARD SERGIO ARQUETO,
PRISON GUARD W. DRESE,
PRISON GUARD PACKER,
PRISON GUARD COLBY ROTHERMEL,
PRISON GUARD EDWARD GHEE,
PRISON GUARD C. LITTLE,
PRISON GUARD C. SCHULTZ,
PRISON GUARD A. McALLUM,
PRISON GUARD E. FISHER,
PRISON GUARD C. GASS,
PRISON GUARD J. TRIBLEY,
PRISON GUARD DILT,
PRISON GUARD BALSACCI,
PRISON GUARD FOURA,
PRISON GUARD KING,
PRISON GUARD HEINTZELMAN

ALL OF USP - LEWISBURG
2400 ROBERT MILLER RD.
LEWISBURG, PA 17837.1000

AND

PRISON GUARD RANDALL L. SPADE

AND

CHARLES E. SAMUALS, SR.,
ASSISTANT DIRECTOR,
FEDERAL BUREAU OF PRISONS
320 FIRST ST., N.W.
WASHINGTON, DC 20534

DEFENDANTS, *

* IN THEIR PERSONAL AND OFFICIAL CAPACITY

AMENDED CIVIL COMPLAINT

I. Jurisdiction: THIS COMPLAINT IS BROUGHT
PURSUANT TO 28 U.S.C. §§ 1331-1346; 5 U.S.C. §
553; 18 U.S.C. § 4042; AND 28 U.S.C. § 2672, '42
U.S.C. § 1985,

II. COMPLAINT

I ON OR ABOUT NOVEMBER 19, 2008, ON

VIOLATION OF TITLE 5 U.S.C. §§ 553 (b) & (d), DEFENDANTS LAPPIN, KANE, WATTS, AND SAMUELS, CONSPIRED TO, AND CREATED, A PUNITIVE HOUSING STATUS WITHIN THE FEDERAL BUREAU OF PRISONS (BOP) ENTITLED THE SPECIAL MANAGEMENT UNIT (SMU), A SUPERMAXIMUM SECURITY UNIT, AND FURTHER CONSPIRED TO MIS-LABEL THE UNIT NON-PUNITIVE HOUSING.

2. ON OR ABOUT APRIL 23, 2009, DEFENDANTS LAPPIN, KANE, WATTS AND SAMUELS, ORDERED AND/OR ARRANGED AND DIRECTED THAT THE PLAINTIFF BE PLACED INTO THE SMU, WITHOUT DUE PROCESS.

3. ON OR ABOUT APRIL 23, 2009, DEFENDANTS LAPPIN, WATTS, KANE AND SAMUELS, BEING FULLY AWARE THAT THE PLAINTIFF HAD STAFF AND INMATE SEPARATES IN THE SMU, ORDERED AND ARRANGED FOR THE CENTRAL INMATE MONITORING (CIM)^{1/}, TO BE IGNORED IN REGARDS TO THE PLAINTIFF, AND FOR PLAINTIFF TO BE HOUSED WITH KNOWN ENEMIES, WITH THE SPECIFIC INTENT OF CAUSING THE WRONGFUL DEATH OF THE PLAINTIFF IN VIOLATION OF THE RIGHT TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT AND IN VIOLATION OF TITLE 18 U.S.C. § 4042 & 18 U.S.C. § 241,

^{1/} THE CIM, IS A PROGRAM WITHIN THE BOP COMPUTER AND A POLICY THAT PROHIBITS PERSONS WITH SEPARATE ISSUES FROM EVER BEING HOUSED IN THE SAME FACILITY TOGETHER, OR COMING IN CONTACT WITH ONE ANOTHER.

AND 18 U.S.C. § 242. AS A RESULT, PLAINTIFF WAS ATTACKED AND ASSAULTED ON SEVERAL OCCASIONS, SUFFERING MULTIPLE INJURIES, AS DESCRIBED BELOW.

4. DEFENDANTS LAPPIN, KANE, BLEDSOE, REAR, YOUNG, HUDSON, SAMUELS, ADAMI, HOLLENBACH, TRATE, SNIDER, ROMANO, CUNNINGHAM, PERRIN, FOSNOT, CHAMBERS, JORDAN, BITTENBENDER, HEPNER, CARRASCUILLO, FLEMING, HUNTER, MATHANGY, JOHNSON, SEERA, SCAMPONE, HEATH AND SASSAMAN CONSPIRED TO HAVE INMATES THE PLAINTIFF HAD PREVIOUSLY IDENTIFIED AS ENEMIES FORCED INTO THE PLAINTIFF'S CELL, AND ORDERED ENEMIES INTO THE PLAINTIFF'S CELL, WITH THE EXPRESSED INTENT THAT THE PLAINTIFF AND THE ENEMIES WILL ASSAULT AND/OR KILL ONE ANOTHER, IN THESE PREARRANGED GLADIATOR TYPE BATTLES, IN VIOLATION OF THE EIGHTH AMENDMENT AND 18 U.S.C. § 1042, § 241 & § 242, CAUSING THE PLAINTIFF TO SUFFER MULTIPLE INJURIES, AS DESCRIBED BELOW.

5. DEFENDANTS LAPPIN, KANE, WATTS, SAMUELS, BLEDSOE, REAR, YOUNG, HUDSON, ADAMI, HOLLENBACH, TRATE, SNIDER, ROMANO, CUNNINGHAM, PERRIN, JORDAN, HEPNER, CARRASCUILLO, FLEMING, HUNTER, MATHANGY, JOHNSON, SEERA, SCAMPONE, HEATH, AND SASSAMAN, DESIGNED AND MAINTAIN THE SMU IN A MANNER WHICH SEVERELY LIMITS HUMAN CONTACT, PROHIBITS CONVERSATION WITH OUTSIDE VISITORS, LIMITS CONVERSATION FROM CELL TO CELL, BURNS THE LIGHT IN CELLS CONTINUOUSLY FOR TWENTY-FOUR (24) HOURS A DAY, DOES NOT PERMIT DAILY EXERCISE, PLACEMENT IN SMU

IS INDEFINITE; AND NO REVIEWS OF STATUS ARE CONDUCTED; THERE ARE NO EDUCATIONAL PROGRAMS; PLACEMENT IN SMU ADVERSELY AFFECTS PAROLE ELIGIBILITY AND THE ABILITY TO EARN GOOD TIME CREDITS; ALL IN VIOLATION OF THE SIXTH AND EIGHTH AMENDMENTS, AND 18 USC § 4042, WITHOUT DUE PROCESS, AND FURTHER RESULTED IN AN UNCONSTITUTIONAL LENGTHENING OF PLAINTIFF'S SENTENCE, BEGINNING MAY 11, 2009, AND CONTINUING TO DATE.

6. ON OR ABOUT NOVEMBER 19, 2009, AND CONTINUING TO DATE, DEFENDANTS LAPPIN, KANE, SAMUELS, BLEDSOE, REAR, YOUNG, HUDSON, ADAMI, MOLLERBACH, TRATE, SNIDER, ROMANO, CUNNINGHAM, PERRIN, FOSNOT, OLENSHECKI, CHAMBERS, KARPEN, PIGGS, NEVELS, EDINGER, GASS, POTTER, HEPNER, HUNTER, MANNING, JOHNSON, SEERA, SCAMPONE, HEATH, SABBAMAN, PRUTZMAN, WAGER, T. WAGNER, METZGER, BIDDLE, CRAWFORD, POOTH, HUMMEL, SCHMIDT, MALAKOSKI, VARGESON, GEMBEELING, LYONS, ARCTLEY, REED, SEAGRAVES, SPADE, MORNBERGER, PFLUGER, ARGUETO, AREESE, PACKER, ROTHERMEL, GHEE, LITTLE, SCHULTZ, MCCALLUM, FISHER, GASS, TRIEBLEY, DILT, BALSACH, FOURA, HEINTZELMAN AND KING CONSPIRED TO DEPRIVE THE PLAINTIFF OF HIS CONSTITUTIONAL RIGHTS BY IGNORING AND VIOLATING ALL PREVIOUS SETTLED LAW AND VALIDLY PROMULGATED RULES AND REGULATIONS, REGARDING OPERATIONS OF A MAXIMUM SECURITY SEGREGATION UNIT WITHIN THE BOP, WITH THE SPECIFIC INTENT OF CAUSING HARM TO THE PLAINTIFF, AND THE HOPES THAT NEW LITIGATION WOULD BE INITIATED TO

CHANGE SETTLED LAW, ACTIONS WHICH INCLUDE, BUT ARE NOT LIMITED TO; REFUSING TO ACCEPT, RECEIPT, AND RETURN WITH A RESPONSE, ADMINISTRATIVE REMEDIES, DENYING AND OR RESTRICTING EXERCISE PERIODS, WITH NO DUE PROCESS, AND FOR THE MOST MINUTE ACCUSATIONS OR INTERACTIONS; FOOD AND MEALS ARE WITHHELD OR ALTERED AS A PUNISHMENT; PURPOSEFULLY DESTROYING VIDEO TAPE EVIDENCE OF THE ACTS DESCRIBED HEREIN, AFTER BEING GIVEN PROPER NOTICE TO PRESERVE THEM; RESTRICTING TELEPHONE PRIVILEGES WITHOUT DUE PROCESS, WITH THE EXPRESS PURPOSE OF PREVENTING CONTACT WITH THE PUBLIC, AND SUPPRESSING FREE SPEECH; ROUTINELY PLACING THE PLAINTIFF IN "STRIP CELLS" AS PUNISHMENT WITHOUT DUE PROCESS; REFUSING TO ALLOW THE PLAINTIFF TO RECEIVE MAIL; REFUSING TO ALLOW THE PLAINTIFF TO RECEIVE PERIODICALS IN VIOLATION OF THE FIRST, FOURTH, SIXTH AND EIGHTH AMENDMENTS, AND TITLE 18 U.S.C. §§ 241, 242 AND 4042.

7. ON OR ABOUT APRIL 23, 2009, AND CONTINUING TO DATE, DEFENDANTS LADDIN, WATTS, SAMUELS, KANE, CONSPIRED TO AND APPROVED THE PLAINTIFF TO BE PLACED IN ISOLATION TWICE, BY PLACING THE PLAINTIFF INTO THE SMU FOR ALLEGED DISCIPLINARY OFFENSES FOR WHICH THE PLAINTIFF HAD ALREADY SERVED HIS SANCTIONS, AND FURTHER CONSPIRED TO HOLD THE PLAINTIFF IN SMU AS A LONG-TERM PUNITIVE SECRE-GATION UNIT.

8. FROM ON OR ABOUT MAY 11, 2009, TO ON OR ABOUT

JANUARY 11, 2010, DEFENDANTS LAPPIN, KANE, SAMUELS, BLEDSOE, REAR, HUDSON, GASS, AND YOUNG, FAILED TO PROVIDE A LAW LIBRARY, OR FOLE EQUIVALENT, CAUSING THE PLAINTIFF TO BE DENIED ACCESS TO THE COURT, AND PREVENTING THE PLAINTIFF FROM TIMELY FILING A VALID CHALLENGE TO HIS CRIMINAL SENTENCE.

9. ON OR ABOUT MAY 11, 2009, AND CONTINUING TO DATE, DEFENDANTS LAPPIN, WATTS, KANE, SAMUELS, BLEDSOE, REAR, HUDSON, YOUNG, ADAMI, HOLLENBACH, TRATE, SNIDER, HEPNER, CARRASQUILLO, FLEMMING, HUNTER, MATHINGLY, JOHNSON, SEEBA, SCAMPONE, HEATH AND SASSAMAN, PLACED AND MAINTAIN THE PLAINTIFF IN IMMEDIATE RISK OF PHYSICAL INJURY AND DEATH, BY FAILING TO PROVIDE SUICIDE BUTTONS IN THE CELLS OF CMU, AND/OR SOME EQUIVALENT SIGNALING DEVICE, AND FAILING TO ENSURE THAT CELL RANGES WERE ROUTINELY PATROLLED, TO INTERVENE IN IN-CELL ALTERCATIONS AND SUICIDE ATTEMPTS, THUS FAILING TO PROTECT IN VIOLATION OF THE EIGHTH AMENDMENT AND 18 U.S.C. § 4042,

11. BEGINNING ON OR ABOUT MAY 11, 2009, AND CONTINUING TO DATE, DEFENDANTS LAPPIN, WATTS, KANE, SAMUELS, BLEDSOE, REAR, YOUNG, HUDSON, TRATE, SNIDER, ADAMI, HOLLENBACH, ROMANO, CUNNINGHAM, PERRIN, FOSNOT, OLENSHESKI, CHAMBERS, JORDAN, BITTENBENDER, CARRASQUILLO, HUNTER, MATHINGLY, JOHNSON, HEATH, PRITZMAN,

3. WAGNER, T. WAGNER, BIDDLE, HUMMEL, REED, SEAGRANES, HORNBERGER, PFLUGER, AUGUSTO, DEECE, ROTHERMEL, SPADE, TREBLEY, GLEE, FISHER CONSPIRED TO DENY THE PLAINTIFF ACCESS TO THE COURTS, BY DENYING HIM ACCESS TO HIS LEGAL MATERIALS, DESPITE BEING FULLY ADVISED OF THE EXPRESSED NEED FOR THE MATERIALS, BY THE COURTS, AND CONTINUE TO WITHHOLD THOSE MATERIALS TO DATE.

12. ON OR ABOUT DECEMBER 22, 2009, DEFENDANTS LAPPIN, KANE, AND SAMUELS, CONSPIRED TO HAVE THE PLAINTIFF KILLED, IN RETALIATION FOR FILING COMPLAINTS REGARDING THE SMU, AND ASSISTING OTHER INMATES IN FILING COMPLAINTS REGARDING THE SMU, BY ORDERING THE PLAINTIFF TO BE FORCED INTO A RECREATION CAGE WITH AN INMATE PLAINTIFF HAD PREVIOUSLY IDENTIFIED AS AN ENEMY. AS A RESULT, THE PLAINTIFF WAS ASSAULTED, AND SUFFERED CUTS, ABRASIONS AND A DISLOCATION OF HIS SHOULDER,

13. ON OR ABOUT JULY 1, 2010, DEFENDANTS LAPPIN, WAITE, KANE, SCHMIDT, SAMUELS, HUDSON, AND BITTEN-BENDER, CONSPIRED TO RETALIATE AGAINST THE PLAINTIFF, FOR FILING COMPLAINTS REGARDING THE SMU, BY FABRICATING AND PROCESSING AN INCIDENT REPORT AGAINST THE PLAINTIFF, CAUSING AN UNCONSTITUTIONAL LENGTHENING OF SENTENCE, AND DEPRIVATION OF RIGHTS WITHOUT DUE PROCESS.

14. ON OR ABOUT JULY 8, 2010, DEFENDANTS LAPPIN,

KANE, SAMUEL, BLEDSOE, REAR, YOUNG, TRATE, SWIDER, PERRIN, BITTENBENDER, POTTER, HUNTER, POETH, MALAKUSKI, PRUTZMAN, REED, HORNBERGER, BRESE, FISHER, FOUR, AND BALSBACK, CONSPIRED TO KILL THE PLAINTIFF, BY FORCING THE PLAINTIFF INTO A CELL WITH AN ENEMY INMATE, WHEN THE PLAINTIFF REFUSED, THESE DEFENDANTS ASSAULTED THE PLAINTIFF AND PLACED HIM IN HARD RESTRAINTS, CAUSING THE PLAINTIFF TO SUFFER A SWOLLEN EYE, BROKEN NOSE, SPRAIN KNEE, CUTS TO HIS WRIST AND NERVE DAMAGE.

15. ON OR ABOUT July 8, -9, 2010, DEFENDANTS PICO, ZOOK, PRIORA, FASCIANA AND POTTER, REFUSED TO TREAT THE PLAINTIFF FOR THE INJURIES HE SUFFERED FROM BEING ASSAULTED ON OR ABOUT July 8, 2010, AND REFUSED TO RECORD THEM OR TAKE PICTURES OF THEM, AND WERE DELIBERATELY INDIFFERENT TO THE PLAINTIFF'S SERIOUS MEDICAL NEEDS.

16. ON OR ABOUT July 13, 2010, DEFENDANTS BLEDSOE, HUDSON, TRATE, BITTENBENDER, HUMMEL, PFLUGER, AND CRAWFORD, CONSPIRED TO RETALIATE AGAINST THE PLAINTIFF, AND TO DEPRIVE PLAINTIFF OF PROPERTY, BY PLANTING CONTRABAND IN THE PLAINTIFF PROPERTY, AND FABRICATING AN INCIDENT REPORT AGAINST THE PLAINTIFF, FOR COMPLAINT ABOUT THE CONDITIONS OF STAY, AND CAUSED THE PLAINTIFF AN UNCONSTITUTIONAL LENGTHENING OF SENTENCE, WITHOUT DUE PROCESS.

17. ON OR ABOUT OCTOBER 25, 2010, DEFENDANTS BLEDSOE, HOLLENBACH, GASS, TRATE, SEERBA AND EDINGER, CONSPIRED TO RETALiate AGAINST THE PLAINTIFF FOR FILING COMPLAINTS REGARDING THE SMU AND TO DEPRIVE THE PLAINTIFF OF RIGHTS WITHOUT DUE PROCESS BY FABRICATING AN INCIDENT REPORT AGAINST THE PLAINTIFF AND CAUSING AN UNCONSTITUTIONAL LENGTHENING OF HIS SENTENCE, UNDUE HARDSHIP AND MENTAL ANXIETY.

18. ON OR ABOUT AUGUST 8, 2010, DEFENDANTS BLEDSOE, REAR, MINK, CANNON, AND KARPEN AND CONTRA, CONSPIRED TO RETALiate AGAINST THE PLAINTIFF AND TO DENY THE PLAINTIFF MENTAL HEALTH TREATMENT, BY CHANGING AND REFUSING TO HONOR PLAINTIFF'S AXIS I MENTAL HEALTH DIAGNOSIS, AND DID SO IN FURTHERANCE OF THE CONSPIRACY TO KEEP THE PLAINTIFF IN SMU, AND SUBJECT TO DISCIPLINARY ACTIONS.

19. ON OR ABOUT OCTOBER 15, 2010, DEFENDANTS LAPPIN, BLEDSOE, HUDSON, TRATE, SNIDER, SEERBA, FOURAY, MALAKOSKI, GEMBERLING, CARRASQUILLO, PRUTZMAN, EDINGER, POETH, VARGESON, FISHER AND BALSAPACH, CONSPIRED TO KILL THE PLAINTIFF, BY FORCING AN ENEMY INMATE INTO THE PLAINTIFF'S CELL, FOR A FORCED GLADIATOR MATCH, AND WHEN THE PLAINTIFF REFUSED, THE DEFENDANTS ASSAULTED THE PLAINTIFF AND PLACED HIM IN HARD RESTRAINTS, CAUSING THE PLAINTIFF TO SUFFER A MILD CONCUSSION, BACK INJURIES, A WRIST SPRAIN, AND INCREASED NERVE DAMAGE.

20. ON OR ABOUT OCTOBER 15, 2010, DEFENDANTS PEGOS, ZOOK, PREORIA, FASCIANA AND POTTER, CONSPIRED TO DENY PLAINTIFF MEDICAL TREATMENT FOR THE INJURIES SUFFERED DURING THE PLACEMENT IN RESTRAINTS AND ASSAULT, AND REFUSED TO DOCUMENT PLAINTIFF'S INJURIES. PLAINTIFF WAS DENIED MEDICAL TREATMENT BY THESE DEFENDANTS, AND DELIBERATE INDIFFERENCE WAS SHOWN TO HIS SERIOUS MEDICAL NEEDS.

21. ON NOVEMBER 2, AND NOVEMBER 8, 2011, DEFENDANTS BLEDSOE, HUDSON, TRATE, SNIDER, PERRIN, FOSNOT, T. WAGNER, SPADE, CLENSHUSKI, AND CHAMBERS, CONSPIRED TO RETALIATE AGAINST THE PLAINTIFFS AND SEIZED AND CONTINUE TO WITHHOLD TO DATE SEVERAL OF THE PLAINTIFF'S OUTGOING LETTERS TO THE COURTS, FAMILY AND FRIENDS, AND VIOLATES PLAINTIFF'S FREE ASSOCIATION AND DUE PROCESS RIGHTS, AND RIGHT TO ACCESS THE COURT.

22. ON NOVEMBER 15, 2010, DEFENDANTS LAPPIN, BLEDSOE, YOUNG, HUDSON, REAR, TRATE, CHAMBERS, PERRIN, HEATH, EDINGER, J. WAGNER, SEERBA, METZGER, AND BIDDLE, CONSPIRED TO KILL THE PLAINTIFF BY FORCING THE PLAINTIFF INTO A CELL WITH AN ENEMY. WHEN THE PLAINTIFF REFUSED, THE DEFENDANTS RETALIATED BY FABRICATING AN INCIDENT REPORT AGAINST THE PLAINTIFFS CAUSING A LOSS OF LIBERTY AND UNCONSTITUTIONAL LENGTHENING OF SENTENCE.

23. ON NOVEMBER 16, 2010, DEFENDANTS LAPPIN, SAMUELS,

KANE, PACKER, SPADE, SASSAMAN, EDINGER, TRATE, HUDSON, SNIDER, PERREN AND HEATH, CONSPIRED TO KILL THE PLAINTIFF, BY FORCING AN ENEMY INMATE INTO THE PLAINTIFF'S CELL, AND WHEN THE PLAINTIFF REFUSED, HE WAS ASSAULTED BY DEFENDANTS FOWNA, KING, J. WAGNER, BIDDING, PACKER, AND POTTER, HEINTZELMAN AND JOHNSON, AND PLACED IN HARD RESTRAINTS, CAUSING THE PLAINTIFF TO SUFFER A FRACTURED ARM, WRIST, WAIST, AND KNEE INJURIES.

24. ON NOVEMBER 16, 2010, DEFENDANTS PIGOS, COOK, POTTER, PREORIA AND FACIANA, REFUSED TO TREAT THE PLAINTIFF AND RECORD, THE INJURIES SUFFERED IN THE ASSAULT BY STAFF, AND WERE DELIBERATELY INDIFFERENT TO THE PLAINTIFF'S SERIOUS MEDICAL NEEDS AND CAUSED THE PLAINTIFF PAIN AND PROLONGED SUFFERING.

25. ON JANUARY 3, 2011, DEFENDANTS LADDIN, KANE, SAMUALS, BLEDSOE, YOUNG, HUDSON, TRATE, CHAMBERS, GEMBERLING, T. WAGNER, JORDAN, SASSAMAN, AND EDINGER, CONSPIRED TO KILL THE PLAINTIFF BY FORCING THE PLAINTIFF INTO A RECREATION CAGE WITH INMATE ENEMY, AND ORDERING THE PLAINTIFF AND INMATE ENEMY TO FIGHT, OR BE SHOT WITH MUNITIONS. WHEN THE PLAINTIFF REFUSED, HE WAS SHOT SEVERAL TIMES WITH PEPPER BALL GUNS, INCLUDING FIVE (5) SHOTS DIRECTLY INTO PLAINTIFF'S MOUTH, DESIGNED TO KILL HIM. AS A RESULT, PLAINTIFF HAD TO RECEIVE EMERGENCY TREATMENT AND RESUSCITATION, AND FEAR

PERMANENT BREATHING PROBLEMS AND MEMORY LOSS,
BRUISED RIBS, CUTS AND ABRASIONS,

27. ON JANUARY 4, 2011, DEFENDANTS PIGOS, POTTER, COOK, PRORIA, AND FASCIANA, REFUSED TO DOCUMENT AND TREAT PLAINTIFF'S INJURIES FROM THE JANUARY 3RD ALTERCATION, AND WERE DELIBERATELY INDIFFERENT TO PLAINTIFF'S SERIOUS MEDICAL NEEDS.

28. ON JANUARY 31, 2011, DEFENDANTS LADDIN, KANE, SAMUELS, BLEDSOE, REAR, HUNSON, TRATE, SNIDER, PERREN, HEATH, CHAMBERS, CARPENTER, AND CARRASQUILLO, CONSPIRED TO KILL THE PLAINTIFF, BY FORCING AN INMATE ENEMY INTO THE PLAINTIFF'S CELL, AND ORDERING THE PLAINTIFF TO FIGHT THE ENEMY. WHEN THE ENEMY REFUSED TO RE-ENTER THE CELL, DEFENDANTS ROTHGRENEL, GEMBEHLING, CARRASQUILLO, LITTLE, POETH, PRUNTZAVAN, POTTER, AND HUNTER ASSAULTED THE PLAINTIFF AND PLACED HIM IN FLARE RESTRAINTS. PLAINTIFF SUFFERED A SWOLLEN EYE, WAS CHOKED AND KICKED AND LOST CONSCIOUSNESS, AND HAS PERMANENT CRANIAL PAIN.

29. ON FEBRUARY 1, 2011, AND CONTINUING TO DATE, DEFENDANTS PIGOS, POTTER, COOK, PRORIA, AND FASCIANA, REFUSED TO RECORD AND TREAT THE PLAINTIFF'S INJURIES OF JANUARY 31, AND WERE DELIBERATELY INDIFFERENT TO THE PLAINTIFF'S SERIOUS MEDICAL NEEDS.

30. ON FEBRUARY 2, 2011, DEFENDANTS LADDIN, KANE, SAMUELS, BLEDSOE, REAR, HUNSON, TRATE, SNIDER, HOLLOWBACH, PERREN, HEATH, CHAMBERS, CARPENTER

AND CARRASQUILLO, CONSPIRED TO HAVE THE PLAINTIFF KILLED BY FORCING THE PLAINTIFF INTO A CELL WITH AN ENEMY. WHEN THE PLAINTIFF REFUSED, DEFENDANTS CARRASQUILLO, REAR, CONTI, MALAKOSKI, LITTLE, HEINTZEMAN, CARPENTER, FISHER, AND POETH AND BALSAPACH, AND METZGER, ASSAULTED THE PLAINTIFF, AND PLACED HIM IN HARD RESTRAINTS. PLAINTIFF'S PHYSICAL INJURIES WERE AGGRAVATED, AND WOUNDS REOPENED. ADDITIONALLY, PLAINTIFF SUFFERED PERMANENT NUMBING IN HIS HEAD, HANDS, AND FEET, FROM THE RESTRAINTS, AND ASSAULT.

31. ON OR ABOUT FEBRUARY 3, 2011, AND CONTINUING TO DATE, DEFENDANTS PIGOS, ZOOK, PEORIA, PASCIANA, AND POTTER, CONSPIRED TO DENY THE PLAINTIFF MEDICAL TREATMENT FOR THE INJURIES SUFFERED ON OR FEBRUARY 2, AND REFUSED TO DOCUMENT THE PLAINTIFF'S INJURIES, AND TO TREAT THE PLAINTIFF AND WERE DELIBERATELY INDIFFERENT TO THE PLAINTIFF'S SERIOUS MEDICAL NEEDS.

32. ON JANUARY 21, 2011, DEFENDANTS KANE, BLEDSOE, HUDSON, YOUNG, REAR, TRATE, SNIDER, PERRIN, DEESE, FOSNOT, HEATH, CARPENTER, AND HUNTER, FORCED THE PLAINTIFF INTO A CELL WITH AN ENEMY INMATE, AND CONSPIRED TO HAVE THE PLAINTIFF KILLED AND ASSAULTED BY THAT INMATE. PLAINTIFF AS A RESULT SUFFERED A SWOLLEN EYE, BLOODY NOSE, AND WHEN HE REFUSED TO CONTINUE FIGHTING THE ENEMY INMATE, DEFENDANTS TRATE, PERRIN, GEMBERLING, DEESE, HUNTER, SNIDER, FOSNOT, AND HEATH, STOLE ALL OF THE PLAINTIFF'S PERSONAL PROPERTY, AND

LEGAL MATERIALS, CAUSING THE PLAINTIFF TO MISS COURT HEARINGS, TO INCLUDE FOR THIS INSTANT ACTION, AND DENYING PLAINTIFF ACCESS TO THE COURTS, AND CONTINUE TO WITHHOLD CERTAIN PERSONAL PROPERTY TO DATE.

33. ON JANUARY 21, 2011, DEFENDANTS KANE, BLEDSOE, HUDSON, YOUNG, SAMUELS, REAR, TRATE, SNIDER, PERRIN, FOSNOT, HEATH, CARPENTER, HUNTER, AND MANNING, CONSPIRED TO RETALiate AND HAVE THE PLAINTIFF KILLED, FOR DISCONTINUING A FIGHT WITH AN ENEMY INMATE EARLIER THE SAME DAY, AND ATTEMPTED TO FORCE A SECOND ENEMY INMATE INTO THE PLAINTIFF'S CELL. WHEN THE PLAINTIFF REFUSED, DEFENDANTS MANNING, POTTER, VARGESON, GEMBERLING, LITTLE, SEAGRAVES, BREESE, ROTHERMEL, FISHER, BILT, FOUER, AND BALSACH, ASSAULTED THE PLAINTIFF, AND PLACED HIM IN HARD RESTRAINTS, INJURING THE PLAINTIFF'S NECK, ARMS, WAIST, LEGS, AND FURTHERING THE DAMAGE TO THE PLAINTIFF'S NERVES.

34. ON JANUARY 21, 2011, DEFENDANTS DIGGS, POTTER, ZOOK, FREORIA, FASCIANA, REFUSED TO TREAT AND RECORD THE PLAINTIFF'S INJURIES SUFFERED IN THE FIGHT AND ASSAULT THAT DAY, AND WERE DELIBERATELY INTERFERENT TO THE PLAINTIFF'S SERIOUS MEDICAL NEEDS.

35. ON FEBRUARY 22, 2011, DEFENDANTS BLEDSOE, REAR, HOLLENBACH, YOUNG, METZGER, CHANCE, HUDSON, TRATE, CARPENTER, HUNTER, HENNING, CARRASQUILLO, MANNING, POERM AND BIDDLE WERE NOTIFIED

THAT THE PLAINTIFF AND HIS CELLMATE WERE NOT GETTING ALONG AND REQUESTED TO BE SEPERATED, BY THE PLAINTIFF AND INMATE MARCO ROBERTSON, OVER A PERIOD OF DAYS. THESE DEFENDANTS REFUSED TO SEPERATE THE PLAINTIFF AND ROBERTSON, AND TOLD THEM THEY HAD TO FIGHT AND INJURE ONE ANOTHER FIRST AND NOT ONLY WOULD THEY BE SEPERATED, THEY WOULD BE REWARDED, IF THEY PUT ON A GOOD SHOW. AS A RESULT, ROBERTSON ATTACKED THE PLAINTIFF. PLAINTIFF WAS CHOKED, SUFFERED A BLOODY NOSE, SWOLLEN EYE, AND BITE TO THE SHOULDER AND WAS SHOT BY THE DEFENDANTS WITH CHEMICAL MUNITIONS, BURNING THE PLAINTIFF AND CAUSING BREATHING PROBLEMS.

35. ON JUNE 30, 2010, DEFENDANT JEFFREY SCHMIDT, TOUCHED, CARRESSED AND STROKED THE PLAINTIFF'S PENTS VIOLENTLY, WHILE PLAINTIFF WAS IN THE SHOWER, UNWARRANTLY. WHEN PLAINTIFF REPORTED THIS TO THE PRISON OFFICIALS, SCHMIDT RETALIATED IN VARIOUS WAYS, AS NOTED HEREIN. THE ACTIONS OF SCHMIDT CONSTITUTE A SEXUAL ASSAULT.

36. ON OR ABOUT JULY 2, 2010, DEFENDANTS LAPPIN, KANE, SAMUELS, BLEDSOE, SCHMIDT, CHAMBERS, BITTENBENDER, AND FORNOT, CONSPIRED TO COVER UP SCHMIDT'S SEXUAL ASSAULT OF THE PLAINTIFF, AND TO RETALIATE AGAINST THE PLAINTIFF FOR COMING FORTH WITH HIS COMPLAINT. BY FABRICATING AND PROCESSING INCIDENT REPORTS ON THE PLAINTIFF AND FORCING THE PLAINTIFF INTO CELLS WITH ENEMIES, CAUSING MULTIPLE INJURIES, AS DESCRIBED HEREIN.

37. ON OR ABOUT July 11, 2010, DEFENDANTS REAR, BLEDSOE, HOLLOWBACH, EDINGER AND GASS, CONSPIRED TO DENY THE PLAINTIFF ACCESS TO THE COURT, AND PREVENT THE PLAINTIFF FROM FURTHER FILING COMPLAINTS REGARDING THE SMU, BY SEIZING PLAINTIFFS LEGAL DOCUMENTS AND COMPLAINT FORMS, AND CONTINUING TO WITHHOLD THEM TO DATE

38. ON July 13, 2010 DEFENDANTS HUDSON, HUMMEL, CRAWFORD, YRAT, SNIDER, PFLUGER, AND OLENSHECKI, CONSPIRED TO RETALIATE AGAINST THE PLAINTIFF FOR FILING COMPLAINTS AGAINST SMU, AND HELPING OTHER TO FILE COMPLAINTS, BY STEALING THE PLAINTIFFS LAW AND EDUCATIONAL BOOKS, AND CONTINUING TO WITHHOLD THEM TO DATE, WITHOUT DUE PROCESS.

39. ON OR ABOUT July 27, 2010, DEFENDANTS SNIDER, BLEDSOE, YRAT, HUDSON, AND GEMBERLING AND HEPNER, CONSPIRED TO HAVE THE PLAINTIFF KILLED, BY FORCING THE PLAINTIFF INTO A RECREATION CAGE WITH TWO PREVIOUSLY IDENTIFIED ENEMY INMATES, CAUSING THE PLAINTIFF TO BE SEVERELY ASSAULTED. WHEN THE PLAINTIFF REQUESTED A MEDICAL EXAM FOLLOWING THIS ASSAULT, THESE DEFENDANTS REFUSED TO ALLOW HIM TO BE EXAMINED BY MEDICAL STAFF, EVEN THOUGH THE PLAINTIFF WAS BLEEDING FROM A HEAD ONE.

40. ON OR ABOUT July 10, 2010 DEFENDANTS SNIDER, BLEDSOE, PERRIN, FOSNOT, HEATH, GEMBERLING, KANE, EDINGER, LAPPIN AND SAMUELS, SCAMPONE, CONSPIRED TO HAVE THE PLAINTIFF KILLED AND/OR BRUTALIZED

By forcing plaintiff into a cell with inmate RICHARD DANIELS, AFTER THE PLAINTIFF AND DANIELS NOTIFIED THEM THAT THEY WERE ENEMIES. AS A RESULT, PLAINTIFF WAS ASSAULTED EVERY DAY BY DANIELS, AND HAD HIS FOOD AND PROPERTY TAKEN FROM HIM. NEARLY DAILY, PLAINTIFF REPORTED TO OFFICIALS OF THE ONGOING BRUTALITY AND REQUESTED A CELL MOVEMENT, THIS WAS DENIED. PLAINTIFF SHOWED THESE DEFENDANTS MULTIPLE INJURIES HE WAS INCURRING, AND THE RAPID WEIGHT LOSS, YET NO ACTION WAS TAKEN. EVEN DANIELS INFORMED THESE DEFENDANTS AND PUT IN WRITTEN REQUEST, TO HAVE THE PLAINTIFF MOVED WHICH WERE DENIED ON SEPTEMBER 3, 2010, AFTER THE PLAINTIFF WAS CHOKED INTO UNCONSCIOUSNESS, HE WAS FINALLY MOVED, HOWEVER, DEFENDANT SCAMPONE GAVE A SUBSTANTIAL PORTION OF THE PLAINTIFF'S PERSONAL PROPERTY TO DANIELS. DEFENDANTS BLEDSOE, PERAIN AND HEATH AND GEMESLING, CLAIMED THAT FROM THAT DAY FORWARD, THAT THE PLAINTIFF WOULD BE KEPT SEPARATED FROM DANIELS, HOWEVER, ON SEPTEMBER 24, 2010, PLAINTIFF FORCED INTO A RECREATION CAGE WITH DANIELS, AND ASSAULTED AGAIN. THE INDIVIDUAL, AND COLLECTIVE ACTIONS OF THESE DEFENDANTS, CAUSED THE PLAINTIFF TO SUFFER A FRACTURED ARM, LEG, SPRAINED WRISTS, MULTIPLE CUTS AND NECK INJURIES, ABRASIONS, FRACTURED EYE SOCKET, LOSS OF BLOOD, MENTAL AND EMOTIONAL DURESS AND A LOSS OF PROPERTY.

71. ON OR ABOUT SEPTEMBER 3, 2010, DEFENDANTS, BLEDSOE, REAR, HUDSON, ELINGER, HOTTENBACH, TRATE, SNIDER,

YOUNG, SPADE, SCAMPONE, JOHNSON, HEATH, PERRIN, FOSNOT AND GEMBERLING, CONSPIRED TO HAVE THE PLAINTIFF KILL AND/OR ASSAULTED, BY FORCING THE PLAINTIFF INTO A CELL WITH INMATE RALPHIE LITTLE AFTER THE PLAINTIFF AND LITTLE TOLD THEM THAT THEY WERE ENEMIES. PLAINTIFF WAS THEN SUBJECTED TO DAILY FIGHTS OR ASSAULTS BY LITTLE. NEARLY DAILY, THE ALTERCATIONS WERE REPORTED TO THESE DEFENDANTS WHO TOOK NO ACTION NEARLY DAILY. MEDICAL TREATMENT WAS REQUESTED, BUT DENIED. THIS EVENT FINALLY CULMINATED, ON SEPTEMBER 28, 2010, WHEN LITTLE ASSAULTED THE PLAINTIFF WHILE THE PLAINTIFF WAS WEARING HANDCUFFS, SHORTLY AFTER DEFENDANT YOUNG HAD STATED HE WANTED TO SEE THE PLAINTIFF ASSAULTED. DURING THIS PERIOD, THE PLAINTIFF SUFFERED A BROKEN NOSE, SWOLLEN EYE, BRUISED RIBS AND LEGS CUTS, ABRASIONS, MENTAL ANGUISH AND ANXIETY.

42 ON OR ABOUT SEPTEMBER 3, 2010, DEFENDANTS FIGGS, ZOOK, PRORIA, FASCIANA AND POTTER, REFUSED TO TREAT PLAINTIFF FOR HIS INJURIES RESULTING FROM BEING ASSAULTED REFUSED TO RECORD PLAINTIFF'S INJURIES AND CONTINUE TO REFUSE TREATMENT TO DATE. THESE DEFENDANTS ARE DELIBERATELY INTERFERENT TO THE PLAINTIFF'S SERIOUS MEDICAL NEEDS.

43 ON OCTOBER 4, 2010, DEFENDANT SPADE ("CRAND") SEXUALLY ASSAULTED THE PLAINTIFF BY FONDLING THE PLAINTIFF'S PENTS AND GENITALS, AND CLAIMED TO BE INFATUATED WITH THE SIZE

OF THE PLAINTIFF'S ENDOWMENT. SPADE INFORMED THE PLAINTIFF THAT HE WANTED TO PERFORM ORAL SEX ON THE PLAINTIFF, IN EXCHANGE FOR GRATUITIES. SPADE THREATENED THE PLAINTIFF NOT TO REPORT HIM TO PRISON OFFICIALS. HOWEVER, PLAINTIFF DID REPORT THE SEXUAL ASSAULT, AND SPADE BEGAN TO RETALIATE AS LISTED BELOW. PLAINTIFF SUFFERED SCRATCHES ON HIS TESTICLES AND BROKEN SKIN ON HIS PENIS.

44. ON OCTOBER 4, 2010, DEFENDANTS BLEDSOE, SPADE, PACKER, HUDSON, CHAMBERS, HEATH, PERRIN, TRATE, SNIDER, YOUNG, DREESE, JOHNSON, AND FORNOT, CONSPIRED TO RETALIATE AGAINST THE PLAINTIFF FOR COMING FORTH AND PURSUING HIS SEXUAL ASSAULT COMPLAINT AGAINST SPADE. PLAINTIFF'S RADIO, HEADPHONES, ORTHOPEDIC GLOVES, AND TWO (2) PAIRS OF ATHLETIC SHOES, WERE STOLEN FROM THE PLAINTIFF, UNDER THE CONDITION THEY WOULD BE RETURNED IF PLAINTIFF DID NOT PURSUE HIS SEXUAL ASSAULT COMPLAINT. TO DATE, THE DEFENDANTS STILL HAVE THE PLAINTIFF'S PERSONAL PROPERTY. AS A RESULT, PLAINTIFF SUFFERS CONSTANT LEG AND HIP PAIN, RAPID JOINT DEGENERATION, PAIN IN THE KNEE, AUXILIARY ROB AND CERVICAL AREA OF THE LEG, AND ANTICIPATED COURT DEADLINES FOR VAID CHALLENGES TO HIS CRIMINAL SENTENCE.

45. ON OCTOBER 4, 2010, DEFENDANTS BLEDSOE, SPADE, HUDSON, CHAMBERS, SEERBA, TRATE, PERRIN, YOUNG, SNIDER, HEATH, T. WAGNER, J. WAGNER, AND FORNOT, CONSPIRED TO RETALIATE ON THE PLAINTIFF FOR PURSUING HIS SEXUAL ASSAULT CLAIMS AGAINST SPADE AND SCHMITZ, AND FOR CONTINUING TO FILE

COMPLAINTS REGARDING SMU, BY FORCING AN ENEMY INMATE NAME WILLIAMS, "066, INTO THE PLAINTIFF'S CELL AND ORDERING HIM TO ASSAULT THE PLAINTIFF WHILE THE PLAINTIFF WAS WEARING HANDCUFFS. JUST PRIOR TO BEING FORCED INTO THE CELL BOTH THE PLAINTIFF AND WILLIAMS, TOLD THE DEFENDANTS THAT WE WERE ENEMIES. PLAINTIFF SUFFERED A LOT PAIN, BUSTED UP, MULTIPLE ABRASIONS, AND CONTINUES TO HAVE NIGHTMARES TO DATE.

46. ON OR ABOUT NOVEMBER 15, 2010, DEFENDANTS LAPPIN, KANE, SAMUELS, BLEDSOE, MAY, HUDSON, SPADE, PERRIN, FOSNOT, HEATH, EDINGER, TRATE, T. WAGNER, J. WAGNER, MATHINICH, HUNTER, AND DREESE, CONSPIRED TO RETALIATE AGAINST THE PLAINTIFF FOR PURSUING HIS SEXUAL ASSAULT CLAIMS, AND FOR CONTINUING TO FILE COMPLAINTS REGARDING THE SMU, AND FURTHER CONSPIRED TO COVERUP THE SPADE SEXUAL ASSAULT, BY TAMPERING WITH, DESTROYING, OR ALTERING VIDEO TAPE EVIDENCE, IN DIRECT VIOLATION OF A COURT ORDER AND BY STEALING AND WITHHOLDING MORE OF THE PLAINTIFF'S PERSONAL PROPERTY AS IF IN "RANSOM", I.E. TWO (2) LAW BOOKS, MULTIPLE PERSONAL HYGIENE ITEMS, FAMILY PHOTOGRAPHS, ETC, AND CONTINUE TO WITHHOLD THESE TO DATE, IN FURTHERANCE OF THE CONSPIRACY, THESE DEFENDANTS, ALONG WITH DEFENDANTS ROTHKREML AND TRIERLEY, ALTERED, COLLABORATED, AND FALSIFIED REPORTS AND EVIDENCE RELATED TO THE SEXUAL ASSAULT.

ON OR ABOUT NOVEMBER 17, 2010, DEFENDANTS ROMANO AND CUNNINGHAM, JOINED IN THIS PART OF

THE CONSPIRACY, BY REFUSING TO ACCEPT AND RESPOND TO PLAINTIFF'S VALIDLY SUBMITTED REMEDY COMPLAINT REQUEST, AND ACTIVELY DISSUADING THE PLAINTIFF, VIA THREAT AND INTIMIDATION, FROM PURSUING THESE CLAIMS

47. DEFENDANTS CANNON, KARPEN, CONTER, MINK, PIGOS, ZOOK, PREORIA, AND POTTER, REFUSED TO DOCUMENT AND TREAT THE PLAINTIFF FOR HIS SEXUAL ASSAULT INJURIES, AND THE ANXIETY, DEPRESSION AND PANIC ATTACKS THAT RESULTED THEREFROM, AND WERE DELIBERATELY INDIFFERENT TO THE PLAINTIFF'S SERIOUS MENTAL HEALTH AND MEDICAL NEEDS.

48. ON OR ABOUT SEPTEMBER 16, 2011, DEFENDANTS SCHULTZ, McCALLUM, PRUITTMAN, ARGUSTO, GEMERLING, PERRIN, YOUNG, TRATE, KANE, SAMUELS, KUENOT, GREESE, T. WAGNER, AND JOHNSON CONSPIRED TO RETALIATE AGAINST THE PLAINTIFF FOR FILING COMPLAINTS REGARDING THE SMUG AND FILING A FAILURE TO PROTECT CLAIM AGAINST McCALLUM FOR BEING TOO MORBIDLY OBESE TO MAKE SECURITY CHECKS AND ROUNDS, BY CONFISCATING ALL OF THE PLAINTIFF'S LEGAL MATERIALS, AND SELF ADMITTING THAT THE ACT WAS DESIGNED TO BREACH ATTORNEY-CLIENT CONFIDENTIALITY, AND DENY ACCESS TO THE COURT. FURTHER, THE DEFENDANTS TOOK ALL OF PLAINTIFF'S PERSONAL FAMILY PHOTOGRAPHS, AND ADDRESSES, FOR THE EXPRESS PURPOSE OF BREAKING OFF CLOSE FAMILY TIES, AND CONTINUE TO WITHHOLD THEM TO DATE, UNDER THE THREAT OF DESTRUCTION.